

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

CIVIL ACTION  
NO. 16-CV-10440-NMG

KATHRYN S. GOUIN,  
Plaintiff,

VS.

NOLAN ASSOCIATES, LLC  
d/b/a BOSTON HARBOR CRUISES  
Defendant

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

Now come the Parties in the above-captioned matter and, respectfully move this Honorable Court to extend all discovery deadlines by three [3] months as set forth below and to approve April 4, 2017 as the new date for Mediation.

In support of their motion, the Parties state the following:

1. This is a personal injury action where the Plaintiff, Kathryn Gouin, alleges that she was injured onboard the Defendant's vessel, M/V CODZILLA.
2. The Parties have exchanged written discovery.
3. The Parties are in the process of scheduling depositions, including depositions of the Plaintiff and the Defendant's personnel.
4. The Defendant is still awaiting receipt of the Plaintiff's medical records from her primary care physician which pre-date her alleged injury on August 3, 2014. The Defendant intends to notice her deposition for a date after receipt of said records.
5. Fact discovery is scheduled to end on January 31, 2017.
6. Mediation is presently scheduled on February 1, 2017 before Magistrate Judge Marianne Bowler. Defense counsel will be unable to attend Mediation on that date

*Motion allowed, in part, and denied, in part; the deadlines as requested in paragraph 8 a. through 8 e. are adopted but the final pretrial conference will be held on Wed, Oct 27, 2017 at 3:00 p.m. and trial will commence on Mon, Oct 2, 2017 at 9:00 a.m. NMGorton, USDJ 1/23/17*